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The Honorable Christopher M. Alston
United States Bankruptcy Judge
Hearing Date: August 28, 2020
Hearing Time: 9:30 AM
Hearing Location: Telephonic
Response Date: August 21, 2020

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re:

Chapter 11

V.S. INVESTMENT ASSOC., LLC,

NO. **20-11541**

FIRST APPLICATION FOR INTERIM
COMPENSATION AND REIMBURSEMENT
OF EXPENSES.

Debtor(s).

MOTION

COMES NOW Bountiful Law, PLLC (here in "Bountiful Law"), attorney for debtor, V.S. Investment Assoc., LLC, and applies to the Court for an order granting interim attorney's fees and costs of \$16,941.10 for the period from May 29, 2020 to July 31, 2020, pursuant to §330 of the Bankruptcy Code. This is Bountiful Law's first interim fee request.

This bankruptcy proceeding commenced by the filing of a voluntary Chapter 11 petition on May 29, 2020 (ECF No. 1). An order was entered authorizing employment of Bountiful Law as attorneys for the Debtor on June 11, 2020 (ECF No 16). The Debtor is current on its post-petition expenses, including the US Trustee's quarterly fees.

Bountiful Law is currently holding \$8,000.00 in its client trust account as an advance fee deposit in these proceedings, consistent with the Application to Employ Bountiful Law PLLC and Supporting Declaration filed June 10, 2020. (ECF No. 14). The hourly rate for Attorney Lawrence Blue is \$350.00; the hourly rate for Attorney Brad Puffpaff is \$300.00, and the hourly rate for paralegal services is \$175.00. The

amount in trust is less than the fees requested in this motion. Debtor's members and/or their family members have agreed to pay any remaining amount on behalf of Debtor.

For the period of June 1, 2020 through July 31, 2020, the significant portion of the time outlined below and on the attached billing statement consisted of legal services performed on behalf of the Debtor in this Chapter 11 case, including preparation of the Debtor's schedules, Statement of Financial Affairs, preparation and attendance at the initial debtor interview, meeting of creditors, and case management conference.

Bountiful Law also prepared and filed a Motion for Authorization to File Monthly Financial Report for Non-Operating Corporation (ECF No. 22), an Application to Employ Bountiful Law (ECF No. 14), an Application to Employ a Real Estate Agent (ECF No., 35), A Motion to Approve the Sale of Real Property Free and Clear of Liens (ECF No. 41), and a Response to BRMK Lending, LLC's Motion to Dismiss or for Relief from Stay (ECF No. 44). All matters outlined above were necessary to represent the interest of the estate, and for the benefit of the estate.

Bountiful Law's time for this interim period is fully set forth in the billing statement attached at Exhibit A. A summary is as follows:

A.	General case administration, including preparing case schedules, preparing initial reporting, telephone calls and emails with the client, representation at the Meeting of Creditors, and other general case matters	22 hours
B.	Preparing for and attending Initial Debtor Interview and case management conference, and the preparation and review of monthly reports	6.3 hours
C.	Preparation and drafting motions and applications including, motion to file non-operating report, motion to sell property, and applications to employ professionals.	14.5 hours
D.	Preparation and drafting response to Scheduling Order and Creditor Motion to dismiss or relief from stay	12.9 hours
Total Time Billed		55.7 hours
Dollar Amount Billed		\$ 16,715.00
Post-Petition Expenses		\$ 226.10
Retainer in Trust to be Applied		\$ 8,000.00
Balance Due from Client		\$ 8,941.10

1 WHEREFORE, Bountiful Law requests that:

- 2 1. The Court award interim attorney's fees and costs of \$16,941.40;
- 3 2. The awarded compensation be allowed as an administrative expense under 11 U.S.C. § 503(b);
- 4 and
- 5 3. The compensation be paid from the \$8,000.00 advance fee deposit held in trust by Bountiful
- 6 Law, with the remaining balance due from Debtor.

7 DATED this 6th day of July, 2020.

8 BOUNTIFUL LAW PLLC

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10 /s/Brad L Puffpaff

11 Brad L Puffpaff, WSBA 46434

12 Applicant

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